

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 21-</b>
	:	
<b>v.</b>	:	<b>DATE FILED:</b>
	:	
<b>ERIC AMAEFUNA</b>	:	<b>VIOLATIONS:</b>
	:	<b>26 U.S.C. § 7206(2) (aiding and</b>
	:	<b>assisting in the preparation of false</b>
	:	<b>tax returns - 29 counts)</b>

**INDICTMENT**

**COUNTS ONE THROUGH TWENTY-NINE**  
**(Aiding and Assisting in the Preparation of False Tax Returns)**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. Defendant ERIC AMAEFUNA was a resident of King of Prussia, Pennsylvania.
2. Defendant ERIC AMAEFUNA was the owner and operator of American Financial Stewardship ("AFS"), a tax preparation business operating at 7053 Bustleton Avenue in Philadelphia, Pennsylvania.
3. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering and enforcing the tax laws of the United States, including the assessment and collection of federal income taxes.
4. Pursuant to the Internal Revenue Code and attendant regulations, individual taxpayers generally were required annually to report their income, tax liabilities and, where appropriate, claims for a refund on a Form 1040, U.S. Individual Income Tax Return, filed with the IRS.

5. Defendant ERIC AMAEFUNA prepared and caused to be prepared Forms 1040, and related IRS Schedules, on behalf of client-taxpayers for submission to the IRS.

6. A Schedule A, "Itemized Deductions" ("Schedule A"), was an IRS form that was attached to a Form 1040, when applicable, and used by a taxpayer to itemize and deduct a portion of their medical and dental expenses, certain amounts paid for taxes, mortgage interest, charitable contributions, casualty and theft losses, and unreimbursed employee business expenses.

7. A Form 2106-EZ, "Unreimbursed Employee Business Expenses," was used by an employee to deduct ordinary and necessary expenses attributed to the employee's job. An ordinary expense is one that is common and accepted in a trade, business, or profession. A necessary expense is one that is helpful and appropriate for a business. On the Form 2106-EZ, an employee is permitted to deduct a percentage of the total business miles driven for the year. The total amount of this deduction was reported on the taxpayer's Schedule A, Line 21.

8. A Form 4684, "Casualties and Thefts," was used by a taxpayer to report gains and losses from casualties and thefts. A taxpayer is permitted to deduct losses of property resulting from a fire, storm, shipwreck, or other similar casualty or theft. The total amount of this deduction was reported on the taxpayer's Schedule A, Line 20.

9. A Form 8283, "Noncash Charitable Contributions," is used by a taxpayer to report information about noncash charitable contributions with a total greater than \$500.00. The name and address of the organization, the description of the property, the date of the donation, and the fair market value of the property were required to be reported on the Form 8283. The total amount of this deduction was reported on the taxpayer's Schedule A, Line 17.

10. A Form 8663, "Education Credits," is used by a taxpayer to claim education credits, which are based on adjusted, qualified education expenses paid to an eligible educational institution. There are two types of education credits, the Lifetime Learning Credit and the American Opportunity Credit, which are reported on the taxpayer's Form 1040, Lines 50 and 68, respectively.

11. A Schedule C, "Profit or Loss From Business," (Schedule C) was an IRS form that was attached to a Form 1040, when applicable, and used by taxpayers to report gross receipts, expenses, and profit or loss from a business operated by the taxpayer as a sole proprietorship.

#### Fraudulent Tax Return Preparation Scheme

12. In order to generate false claims for tax refunds, defendant ERIC AMAEFUNA prepared false and fraudulent Forms 1040 and related Schedules A and C for client-taxpayers for at least years 2014 through 2016. Specifically, defendant AMAEFUNA attached Schedules A to Forms 1040 that were false, in that they listed items for deduction that were entirely fictitious or falsely inflated. The Schedules A claimed inflated state and local income taxes paid, false or inflated unreimbursed employee business expenses, and false or inflated miscellaneous deductions. In addition, defendant AMAEFUNA attached Schedules C to Forms 1040 that were false, in that they listed items for business deductions and losses that were entirely fictitious or falsely inflated. These falsities resulted in the filing of Forms 1040 claiming refunds due to the client-taxpayers that they otherwise were not entitled to receive.

13. In or about 2017, defendant ERIC AMAEFUNA prepared a false and fraudulent 2016 Form 1040 for an undercover agent who posed as a client. The return was false in that defendant AMAEFUNA included an item on the Schedule A that was entirely fictitious. Because of the false amount defendant AMAEFUNA included on the Form 1040 and Schedule A for the undercover agent, the Form 1040 falsely reported entitlement to a tax refund when, based on the information actually presented, the undercover agent should have owed a tax.

14. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

**ERIC AMAEFUNA**

willfully aided and assisted in, and procured, counseled, and advised the preparation of U.S. Individual Income Tax Returns, Forms 1040, and accompanying forms and schedules, for the taxpayers and tax years set forth below, which were false and fraudulent as to the material matters set forth below, in that the returns fabricated and falsely overstated items including Schedule A itemized deductions, Schedule C business losses, and falsely listed the filing status of the taxpayer, which the defendant knew contained those materially false items at the time the returns were submitted:

COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
1.	W.P.	2014	February 28, 2015	a. Form 1040, Line 40, itemized deductions of \$35,505. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 4684, including Lines 10, 12, 13, 16, 17 & 18. d. Form 1040, Schedule A, including lines 20, 21, 24, 27 & 29.
2.	W.P.	2015	February 8, 2016	a. Form 1040, Line 40, itemized deductions of \$36, 889. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 4684, including Lines 10, 12, 13, 16, 17 & 18. d. Form 1040, Schedule A, including lines 20, 21, 24, 27 & 29.
3.	W.P.	2016	February 18, 2017	a. Form 1040, Line 40, itemized deductions of \$24,680. b. Form 2106-E7, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
4.	J.M.	2014	February 14, 2015	a. Form 1040, Line 40, itemized deductions of \$25,551. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.
5.	J.M.	2015	February 16, 2016	a. Form 1040, Line 40, itemized deductions of \$22,218. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.

COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
6.	J.M.	2016	April 12, 2017	a. Form 1040, Line 40, itemized deductions of \$24,582. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.
7.	N.S.	2015	March 2, 2016	a. Form 1040, Line 40, itemized deductions of \$27,531. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
8.	N.S.	2016	February 4, 2017	a. Form 1040, Line 40, itemized deductions of \$38,201. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
9.	H.D.	2014	February 7, 2015	a. Form 1040, Line 40, itemized deductions of \$30,091. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.
10.	H.D.	2015	January 30, 2016	a. Form 1040, Line 40, itemized deductions of \$22,587. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
11.	H.D.	2016	January 28, 2017	a. Form 1040, Line 40, itemized deductions of \$22,678. b. Form 2106-EZ, including Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.

COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
12.	J.J.	2014	February 2, 2015	a. Form 1040, Line 40, itemized deductions of \$27,845. b. Form 2106-EZ, Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
13.	J.J.	2015	April 2, 2016	a. Form 1040, Line 40, itemized deductions of \$29,096. b. Form 2106-EZ, Lines 1, 6, & 8. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
14.	J.J.	2016	April 1, 2017	a. Form 1040, Line 40, itemized deductions of \$23,081. b. Form 2106-EZ, Lines 1, 6 & 8. c. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.
15.	A.N.	2014	April 14, 2015	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$27,797. c. Form 1040, Lines 50 & 68. d. Form 2106-EZ, Lines 1, 6 & 8. e. Form 8663, Line 27. f. Form 1040, Schedule A, including lines 1, 3, 4, 21, 24, 27 & 29.
16.	A.N.	2015	April 16, 2016	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$28,217. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
17.	A.N.	2016	April 11, 2017	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$36,180. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.

COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
18.	S.N.	2014	April 14, 2015	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$17,011. c. Form 1040, Lines 50 & 68. d. Form 2106-EZ, Lines 1, 6 & 8. e. Form 8863, Line 27. f. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
19.	S.N.	2015	April 16, 2016	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$14,465. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
20.	S.N.	2016	April 11, 2017	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$23,446. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 8, 9, 21, 24, 27 & 29.
21.	A.E.	2014	January 28, 2015	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 12, business income (loss) of (\$15,664). c. Form 1040, Line 40, itemized deductions of \$34,180. d. Form 2106-EZ, Lines 1, 6, & 8. e. Form 1040, Schedule A, including lines 21, 24, 27 & 29. f. Form 1040, Schedule C, including lines 28, 29 & 31.
22.	A.E.	2015	February 11, 2016	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 12, business income (loss) of (\$13,880). c. Form 1040, Schedule C, including lines 28, 29 & 31.

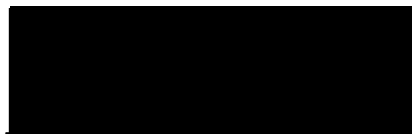


COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
23.	A.E.	2016	February 7, 2017	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 12, business income (loss) of (\$12,250). c. Form 1040, Schedule C, including lines 28, 29 & 31.
24.	M.E.	2014	February 25, 2015	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$16,579. c. Form 2106-EZ, Lines 1, 6 & 8 d. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
25.	M.E.	2015	February 25, 2016	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$15,111. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
26.	M.E.	2016	March 7, 2017	a. Form 1040, Line 4, Head of Household. b. Form 1040, Line 40, itemized deductions of \$11,605. c. Form 2106-EZ, Lines 1, 6 & 8. d. Form 1040, Schedule A, including lines 21, 24, 27 & 29.
27.	A.E.	2014	January 24, 2015	a. Form 1040, Line 40, itemized deductions of \$46,708. b. Form 2106-EZ, Lines 1, 6, 8, 9, 10, 12, 13 & 22. c. Form 1040, Schedule A, including lines 21, 24, 27 & 29

COUNT	CLIENT-TAXPAYER	TAX YEAR	APPROXIMATE DATE	FALSE ITEMS
28.	A.E.	2015	February 4, 2016	a. Form 1040, Line 12, business income (loss) of (\$23,548). b. Form 1040, Line 40, itemized deductions of \$52,287. c. Form 2106-EZ, Lines 1, 6, 8, 9, 10, 12, 13 & 22. d. Form 8283, Lines A & B. e. Form 1040, Schedule A, including lines 17, 19, 21, 24, 27 & 29. f. Form 1040, Schedule C, including lines 28, 29 & 31.
29.	A.E.	2016	February 28, 2017	a. Form 1040, Line 12, business income (loss) of \$1,838. b. Form 1040, Line 40, itemized deductions of \$23,056. c. Form 1040, Schedule A, including lines 8, 9 & 29. d. Form 1040, Schedule C, including lines 28, 29 & 31.

All in violation of Title 26, United States Code, Section 7206(2).

**A TRUE BILL:**



**GRAND JURY FOREPERSON**

*Ronald Barack for*

**JENNIFER ARBITTIER WILLIAMS**  
**Acting United States Attorney**

No. \_\_\_\_\_

UNITED STATES DISTRICT COURT

*Eastern District of Pennsylvania*

*Criminal Division*

THE UNITED STATES OF AMERICA

vs.

ERIC AMAEFUNA

INDICTMENT

Counts

26 U.S.C. § 7206(2) (aiding and assisting in the  
preparation of false tax returns - (29 counts)

\_\_\_\_\_  
*Foreman*

Filed in open court this *Thirteenth* day,  
of *April* A.D. 20*21*

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_